

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

THE GENERAL HOSPITAL
CORPORATION and
DANA-FARBER CANCER
INSTITUTE, INC.,

Plaintiffs,

v.

ESOTERIX GENETIC
LABORATORIES, LLC and
LABORATORY CORPORATION
OF AMERICA HOLDINGS,

Defendants.

C.A. No. 1:18-cv-11360-IT

JOINT MOTION TO AMEND CASE SCHEDULE

The parties, the plaintiffs The General Hospital Corporation and Dana-Farber Cancer Institute, Inc. and the defendants Esoterix Genetic Laboratories, LLC and Laboratory Corporation of America Holdings (a/k/a Laboratory Corporation of America), hereby jointly move to amend the remaining items on the Court's current case schedule [*see* Dkt. No. 139] as set forth below.

Task	Current Deadline	Amended Deadline
Completion of fact depositions	June 30, 2020	September 30, 2020
Completion of fact discovery	June 30, 2020	September 30, 2020
Status Conference	June 30, 2020 @ 2:00 p.m.	September 30, 2020 @ 2:00 p.m. or some other date and time convenient to the Court
Filing of dispositive motions	July 31, 2020	October 30, 2020

In support of their joint motion, and by way of a further status update since the parties joint motion to extend filed on March 19, 2020, the parties state that they have substantially completed email discovery and the discovery of other electronically stored information, and the parties continue to work cooperatively to complete discovery, including the exchange of privilege logs and the taking of depositions. The parties require the requested additional time to allow them sufficient time to take depositions after it is expected that the current COVID-19 crisis and its restrictions on travel and in-person gatherings let up. The parties have exchanged lists of the witnesses they would like to depose, reserving all rights to identify additional individuals, and are working cooperatively on scheduling. The parties anticipate taking many of the depositions in person and respectfully request this further amendment to allow sufficient time for the parties to do so.

WHEREFORE, the parties respectfully request that this Court grant their Joint Motion to Amend Case Schedule.

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Respectfully submitted,

Plaintiffs,
THE GENERAL HOSPITAL
CORPORATION and
DANA-FARBER CANCER
INSTITUTE, INC.

By their attorneys,

/s/ Carolyn M. Crowley
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Defendants,
ESOTERIX GENETIC LABORATORIES,
LLC and LABORATORY CORPORATION
OF AMERICA HOLDINGS,

By their attorneys,

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Dated: June 25, 2020

CERTIFICATE OF SERVICE

I, Carolyn M. Crowley, certify that on June 25, 2020, I filed this Joint Motion to Amend Case Schedule on the Court's CM/ECF system, which will electronically serve all counsel of record in this case.

/s/ Carolyn M. Crowley
Carolyn M. Crowley